

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

In Re:	:	Case Number: 19-50681
	:	
	:	
Christopher D. Janok,	:	Chapter 13
	:	
Debtor(s).	:	Judge Alan M. Koschik

**RESPONSE TO MOTION FOR RELIEF FROM STAY AND CO-DEBTOR STAY OF  
M&T BANK**

**Now comes** Christopher D. Janok, the Debtor by and through his attorney, David A. Mucklow and states the following in response to M&T Bank for Relief from Stay and Co-Debtor Stay:

The Debtor does not oppose this motion and asks that the order is consistent with the Trustee's recommendations as follows: The Creditor shall have 60 days from the date the property is liquidated or one year from the date of the order for relief, whichever comes first, to file a deficiency claim and have said deficiency claim paid as an unsecured claim in accordance with the plan. If the Creditor fails to file a deficiency claim by the deadline, the Creditor may not file a deficiency claim without obtaining court permission.

Respectfully Submitted by:

/s/ David A. Mucklow  
DAVID A. MUCKLOW (#0072875)  
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Akron, OH 44312  
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### **CERTIFICATE OF SERVICE**

I certify that on or about 4<sup>th</sup> day of December, 2019 that a true and correct copy of the foregoing was sent electronically via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice list:

Richard J. LaCivita   rlacivita@reimerlaw.com

Keith Rucinski, Trustee   [efilings@ch13akron.com](mailto:efilings@ch13akron.com)

United States Trustee   (Registered address)@usdoj.gov

I certify on or about 4<sup>th</sup> day of December, 2019 that a true and correct copy of the foregoing was sent via U.S. regular postage prepaid or certified mail to the persons listed below.

Christopher D. Janok  
1233 Nola Avenue  
Barberton, OH 44203

/s/ David A. Mucklow  
DAVID A. MUCKLOW, (#0072875)